

# **Exhibit 4**

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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, NORTHERN DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual;

Defendants,

Case No.:

**DECLARATION OF JENNY L.  
MCBRIDE**

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDING, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

Pursuant to 28 U.S.C. § 1746, the undersigned states as follows:

- 1) My name is Jenny L. McBride. I am over the age of twenty-one (21) and have personal knowledge of the matters set forth herein.
- 2) I am a Paralegal Contractor for the Salt Lake Regional Office of the United States Securities and Exchange Commission (“SEC”) located at 351 S. West Temple, Suite 6.100, Salt Lake City, UT 84101.
- 3) On July 24, 2023, I conducted research to identify any assets held by Defendants and Relief Defendants in the above-captioned litigation. In conducting my research, I used Thomson Reuters CLEAR, a web-based platform that searches public and proprietary databases to identify real- and personal-property ownership records of individuals and entities. Additionally, I reviewed bank account records obtained by the Commission during the course of the investigation.
- 4) The result(s) of my research is attached hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true, correct, and made in good faith.

Executed on July 25, 2023 at Salt Lake City, Utah.

*/s/ Jenny L. McBride*  
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JENNY L. MCBRIDE

# **Exhibit A**

## **EXHIBIT A**

### **List of Identified Assets**

#### **DEFENDANTS**

##### **Digital Licensing Inc.**

###### Bank/Financial Account(s)

- Stripe, Inc., Acct No.: acct\_1IfvEhHywpheYRbA
- Mountain America Credit Union, Acct No.: 13182717
- Zions First National Bank, Acct No.: 983534702,
- Zions First National Bank, Acct No.: 5796522497,

##### **Jason R. Anderson**

###### Real Property/Deed Transfer

- **14942 S. Vantage View Ct., Draper, UT 84020,**
- **1320 N. Chimney Rock Rd, Heber City, UT 84023-1473**, Vacant Land, APN: 00-0020-7305,
- **525 Alienta Dr., St. George, UT 84770-6969**, Single Family Residence, APN: 0787842
- **7689 South 1530 West, West Jordan, UT 84084-4106**, Single Family Residence, APN: 21-27-476-013-0000,
- **1067 W. Briarcliff Ave, Salt Lake City, UT 84116-2205**, Single Family Residence, APN: 08-35-130-004-0000
- **147 South 1300 East, Salt Lake City, UT 84102-3226**, Single Family Residence, APN: 16-05-432-007-0000,

###### Personal Property

- 2022 Ferrari SF 90 Stradale, VIN: ZFF95NLA1N0271071, License Plate No.: CRYPT01
- 2022 Ferrari 812 GTS, VIN: ZFF97CMA1N0282701, License Plate No.: T588DG
- 2022 Ferrari Roma, VIN: ZFF98RNA9N0285442, License Plate No.: G581WH
- 2022 Maserati Levante Base, VIN: ZN661XUAXNX398544, License Plate No.: FLXN,
- 2021 Lamborghini Urus, VIN: ZPBUA1ZL4MLA12263, License Plate No.: FUNDING,
- 2018 Jeep Wrangler Unlimited Sahara, VIN: 1C4HJXEG2JW322085, License Plate No.: SUNNYY,
- 2017 Ferrari California T, VIN: ZFF77XJA7H0223644, License Plate No.: BARB1E,
- 2017 Ferrari 488 Spider, VIN: ZFF80AMA6H0225337, License Plate No.: 3RDW1FE,

###### Bank/Financial Account(s)

- America First Credit Union, Account No. 746038414066, Account Name: Jason R. Anderson

- Stripe, Inc., Account No. acct\_1CXWdsldpWV1oAQ6
- USAA Federal Savings Bank, Account No. 260692182, Account Name: Jason R. Anderson
- Utah First Federal Credit Union, Account No. 775607, Account Name: Jason R. Anderson
- Utah First Federal Credit Union, Account No. 682079, Account Name: Jason R. Anderson

**Jacob S. Anderson**

Real Property/Deed Transfer

- **6120 S. Verness CV, Holladay, UT 84121,**
- **66 South 1000 West, Provo, Utah 84601-4073**, Single Family Residence, APN: 21:021:0036
- **420 South 380 West, Tooele, UT 84074-2902**, Single Family Residence, APN: 10-014-00016

Personal Property

- 2020 Chevrolet Corvette Stingray 3LT, VIN: 1G1Y82D42L5101402, License Plate No.: F085YG, Toyota Sequoia SR5, VIN: 5TDBT44A82S097975, License Plate No.: LOKIN8R

Bank/Financial Account(s)

- America First Credit Union, Account No. 38414074, Account Name: Jacob ("Jake") S. Anderson
- AMEX, American Express Card, Account Name: Jacob ("Jake") S. Anderson

**Schad E. Brannon**

Real Property/Deed Transfer

- **5819 Wish Ave, Encino, CA 91316-1459**, Single Family Residence, APN: 2255-004-020
- **22462 Roscoe Blvd, West Hills, CA 91304-3347**, Single Family Residence, APN: 2013-020-001

Bank/Financial Account(s)

- Zions First National Bank, Account No. 983536798; 983534702; 5796522497; 982485703; Account Name: Schad E. Brannon

**Roydon B. Nelson**

Real Property/Deed Transfers

- **1615 N. Raven Ln., St. George, UT 84770-6159**, APN: SG-PDCN-2-79,
- **1307 Meadowbrook Ct., Farmington, UT 84025-4011**, APN: 08-270-0003,

- **2971 Adams Ave, Ogden, UT 84403-0649**, APN: 04-027-0060
- **1115 E. Homes Creek Ln, Layton, UT 84041-4409**, APN: 11-467-0013

Personal Property

- 2021 Cadillac XT5 Sport, VIN: 1GYKNGRS2MZ182688, License Plate No.: 7T1AV,
- 2019 Toyota Tacoma Double Cab, VIN: 3TMCZ5AN9KM224930, License Plate No.: U206VP
- 2016 Toyota Prius, VIN: JTDKARFU9G3011298, License Plate No.: 6D7KA,
- 2003 Dodge Ram 3500 ST, VIN: 3D7M48C13G836417, License Plate No.: T815GK,
- 1995 Dodge Ram 2500, VIN: 1B7KF26C5SS166512, License Plate No.: T545FT,
- 1994 Ford F150, VIN: 1FTEX14H7RKA80745, License Plate No.: U587UL
- 1991 Ford F150, VIN: 1FTEX15Y8MKA91566, License Plate No.: 0L0FG,
- 2014 Honda Accord EXL, VIN: 1HGCR3F81EA012369, License Plate No.: U173UW,

Bank/Financial Account(s)

- Zions First National Bank, Account No. 983536798; 4238840001655310; 77008373; 982845703; 983534702; 982093593; 5796522497; 4238840001837520; 367020477520; 5796522273; 980750053; 982093601; 982093585; 554009993; 423884001435002; 983533860; 5793279380; 982259780;
  - o Account Name: Roydon B. Nelson

**Ryan Bowen**

Real Property/Deed Transfer

- **152 Spinnaker Dr., Stansbury Park, UT 84074-8946**, Single Family Residence, APN: 09-018-00026,
- **405 American Way, Tooele, UT 84047-2502**, Single Family Residence, APN: 10-045-0-0006,
- **5050 N. Ashlee Way, Erda, UT 84047-8184**, Agricultural, APN: 11-081-0-0017,
- **566 Elk Meadow Loop, Tooele, UT 84074-3155**, Single Family Residence, APN: 08-026-F-0009,
- **694 W. Cephus Rd, Draper, UT 84020-2306**, Single Family Residence, APN: 27-36-101-010-0000
- **784 Elk Meadow Loop, Tooele, UT 84074-3163**, Single Family Residence, APN: 14-071-0-0003,
- **52 Sawgrass Ct, Las Vegas, NV 89113-1325**, Single Family Residence, APN: 163-27-214-014,
- **5994 Bayshore Dr, Tooele, UT 84047-9070**, Single Family Residence, APN: 14-009-0-0515,
- **2915 N. Bronzewood Cir., Erda, UT 84074-3301**, Agricultural, APN: 15-051-0-0028,

- **997 E. Brookfield Ave., Erda, UT 84074-3304**, Agricultural, APN: 15-052-0-0030,
- **1482 E. Spring Canyon Rd., Erda, UT 84074**, APN: 16-024-0-0018,
- **3148 N. Pronghorn Rd, Erda, UT 84074-3311**, Agricultural, APN: 15-052-0-0038,
- **1972 E. Garfield Ave, Salt Lake City, UT 84108-2951**, Single Family Residence, APN: 16-16-433-013-0000,
- **5085 Ashlee Way, Erda, UT 84074-8184**, Agricultural, APN: 11-081-00015
- **997 E. Brookfield Ave, Tooele, UT 84074-3304**, Single Family Residence, APN: 15-052-0-0030
- **746 E. Elk Hollow Dr., Tooele, UT 84074**, APN: 15-098-0-0606
- **224 Spinnaker Dr, Tooele, UT 84074-8947**, APN: 0-018-00035,
- **743 West 740 South, Tooele, UT 84074-3274**, APN: 11-095-00023,
- **295 West Cimmarron Way, Erda, UT 84074-9423**, APN: 09-023-R0026
- **589 West 925 North, Centerville, UT 84014-3466**, APN: 02-172-0211,
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## **IX Global, LLC**

Bank/Financial Account(s)

- Stripe, Inc., Account No. acct\_15GKfQIQTjhSoclz
- Bank of America, NA, Account No. 1391 0498 8643,
- Bank of America, NA, Account No. 1391 0498 8630,
- Bank of America, NA, Account No. 1391 0498 8656,
- JPMorgan Chase Bank, NA, Account No. 765037087,
- JP Morgan Chase Bank, NA, Account No. 3887221712,
- Metropolitan Commercial Bank, Account No. 253903989883,
- Mountain America Credit Union, Account No. 13220736,
  - o Account Name: IX Global LLC

## **Joseph A. Martinez**

Real Property/Deed Transfers

- **769 Tanglewood Loop, North Salt Lake, UT 84054-3342**, APN: 01-206-0407

Personal Property

- 2022 Cadillac Escalade Sport, VIN: 1GYS4FKL8NR205473, License Plate No.: 9U5KE
- 2022 Lamborghini Urus, VIN: ZPBUA1ZL6NLA17160, License Plate No.: 4R3JB,
- 2018 Polaris RZR XP 4 Turbo EPS, VIN: 3NSVFE921JF408319, License Plate No.: V67EC
- 2013 Ford F150 Supercrew, VIN: 1FTFW1ET2DFB09810, License Plate No.: F363JZ

Bank/Financial Account(s)

- JP Morgan Chase Bank, NA, Account No. 470903506, Account Name: Joseph Anthony Martinez
- JP Morgan Chase Bank, NA, Account No. 3046637079, Account Name: Joseph Anthony Martinez
- JP Morgan Chase Bank, NA, Account No. 3046637095, Account Name: Joseph Anthony Martinez
- JP Morgan Chase Bank, NA, Account No. 3046637103, Account Name: Joseph Anthony Martinez
- JP Morgan Chase Bank, NA, Account No. 3887219195, Account Name: Joseph Anthony Martinez
- Wells Fargo Bank, NA, Account No. 3918125125, Account Name: Joseph A. Martinez, Jr.
- Wells Fargo Bank, NA, Account No. 6410796939, Account Name: Joseph A. Martinez, Jr.

**Benjamin F. Daniels**

Real Property/Deed Transfers

- **537 Beacon Ridge Way, Mesquite, NV 89027-6704**, Single Family Residence, APN: 002-24-510-032,
- **3617 W. District Peak Ct, South Jordan, UT 84095-5145**, APN: 27-20-134-012-0000,
- **652 W. Rachelle Park CV, South Jordan, UT 84095-4418**, APN: 27-24-107-010-0000,
- **14743 S. Vintage Rose Court, Herriman, UT 84096-1938**, APN: 32-12-402-015-0000
- **3448 E. Kennekuk Cir, Eagle Mountain, UT 84043-4677**, APN: 44:149:0033,

Personal Property

- 2022 Chevrolet Corvette Stingray 3LT, VIN: 1G1YC3D44N5124607, License Plate No.: 4V2PD,
- 2022 Tesla Model X, VIN: 7SAXCBE65NF355434, License Plate No.: 2W2FJ,
- 2018 Land Rover Range Rover Sport SVR, VIN: SALWZ2SE4JA197456, License Plate No.: U104NS,

**Mark W. Schuler**

Real Property/Deed Transfers

- **9103 S. Hidden Peak Dr, West Jordan, UT 84088-5751**, APN: 27-02-329-001-0000
- **1011 W. Rooftop Dr., Midvale, UT 84047-4805**, APN: 21-26-451-018-0000,
- **13039 S. Cannon View Dr., Riverton, UT 84096-1429**, APN: 26-36-426-015-0000,

Personal Property

- 2012 Toyota Tacoma V6, VIN: 3TMMU4FN6CM045879

**Travis A. Flaherty**

Real Property/Deed Transfers

- **1921 S. Santa Anna Dr, Chandler, AZ 85286-8427**, APN: 303-25-273,
- **4631 E. Collinwood Dr., Gilbert, AZ 85298-4013**, APN: 313-04-047,
- **1807 S. Range Rd, Saratoga Springs, UT 84045-4096**, APN: 52:854:0050,
- **5415 E. McKellips Rd. 18, Mesa, AZ 85215-2652**, APN: 141-44-638,
- **3491 N. Arizona Ave 55, Chandler, AZ 85225-1142**, APN: 30224082,

Personal Property

- 2023 Mercedes Benz S Class, VIN: W1K6G7GB6PA207377, License Plate No.: ASA3MN,
- 2021 Cadillac Escalade ESV, VIN: 1GYS3NKLXMR228815, License Plate No.: PLA0WN,
- 2015 Mercedes Benz S Class, VIN: WDDUG8CB3FA171164, License Plate No.: RHA29B
- 2005 Mercedes Benz E Class, VIN: WDBUF76J65A752196, License Plate No.: MLMFAM,

Bank/Financial Account(s)

- Wells Fargo Bank, NA, Account No. 7196268614, Account Name: Travis A. Flaherty

**Alton O. Parker**

Real Property/Deed Transfers

- **3050 Wolcott St, Ferndale, MI 48220-3605**, APN: 25-27-277-001,
- **4465 S. Mathews Way, Salt Lake City, UT 84124-4207**, APN: 22-01-404-006-0000,
- **379 N. Glenwood St. 2-1, Jackson, WY 83001-8765**, APN: R0004401
- **2120 Corner Creek Ln, Jackson, WY 83001-9200**, APN: 22-40-16-06-2-36-002,

Personal Property

- 2018 Porsche 911 GT3, VIN: WP0AC2A91JS175996, License Plate No.: BKWLD2018 Porsche Macan GTS, VIN: WP1AG2A55JLB64882, License Plate No.: 0C2SH
- 2015 Porsche 911, VIN: WP0AC2A98FS183519, License Plate No.: CHP7449,
- 2017 Lexus RX 350 Base, VIN: 2T2BZMCVA1HC093747

**BW Holdings, LLC (dba the “Fair Project”)**

Real Property/Deed Transfer

- **3796 South 650 West Riverdale, UT 84405-1583**, Single Family Residence, APN: 05-159-0009,

**Brendon J. Stangis**

Personal Property

- 2022 Ford F250 Super Duty, VIN: 1FT7W2BN3NEG10681, License Plate No.: DE65126,

Bank/Financial Account(s)

- JP Morgan Chase Bank, NA, Visa debit at bank, Account Name: Brendon John Stangis

**Matthew D. Fritzsche**

Real Property/Deed Transfers

- **1638 East 12500 South, Draper, UT 84020-9160**, APN: 28-28-380-009-0000
- **743 Cobblestone Dr., Heber City, UT 84032-3988**, APN: 00-0020-3034,

Personal Property

- Can-Am Outlander Max XT 850 ATV, VIN: 3JBLPAU41NJ002697, License Plate No.: OH23155344,
- 2021 Porsche Taycan Cross Turismo, VIN: WP0BA2Y14MSA71102, License Plate No.: P0R2CHE,
- 2020 Ford F150 Raptor, VIN: 1FTFW1RG9LFB08651, License Plate No.: 5R8BT,

Bank/Financial Account(s)

- Utah First Credit Union, Account No. 263970, Account Name: Matthew Dillon Fritzsche

**RELIEF DEFENDANTS**

**Business Funding Solutions, LLC**

Bank/Financial Account(s)

- Utah First Federal Credit Union, Acct No.: 775607,

**Blox Lending, LLC**

Bank/Financial Account(s)

- America First Credit Union, Acct No.: 43822519,
- Bank of America, N.A., Acct No.: 139101503814,

- Bank of America, N.A., Acct No.: 139103861004,
- Bank of America, N.A., Acct No.: 139103861020,
- Washington Federal Bank, Acct No.: 62764708442,

**Calmfritz Holdings, LLC**

Bank/Financial Account(s)

- JPMorgan Chase Bank, Acct No.: 720620639,
- JPMorgan Chase Bank, Acct No.: 780818115,
- US Bank, NA, Acct No.: 000153155074054,

**Calmes & Co, Inc.**

Bank/Financial Account(s)

- JPMorgan Chase Bank, Acct No.: 737762788,
- JPMorgan Chase Bank, Acct No.: 750796549,
- JPMorgan Case Bank, Acct No.: 388078693,

**The Gold Collective LLC**

Bank/Financial Account(s)

- Zions First National Bank, Acct No.: 980750053,
- Zions First National Bank, Acct No.: 982093593,
- Zions First National Bank, Acct No.: 5796522273,
- Zions First National Bank, Acct No.: 982093601,
- Zions First National Bank, Acct No.: 982093585,

**UIU Holdings, LLC**

Bank/Financial Account(s)

- Bank of America, N.A., Acct No.: 139103520882
- Washington Federal Bank, Acct No.: 62764470589,